

1 Thomas E. Frankovich
2 Thomas E. Frankovich,
3 A Professional Law Corporation
4 4328 Redwood Hwy., Suite 300
5 San Rafael, CA 94903
6 Telephone: 415/674-8600
7 Facsimile: 415/674-9900

8
9 Attorneys for Plaintiff CRAIG YATES

10 Charles L. Post, State Bar No. 160443
11 Lizbeth V. West, State Bar No. 207137
12 weintraub genshlea chediak
13 a law corporation
14 400 Capitol Mall, 11th Floor
15 Sacramento, California 95814
16 Telephone: 916/558-6000
17 Facsimile: 916/446-1611

18 Attorneys for Defendants
19 STORE 24 EXPRESS, INC., Trustee of the
20 VELLOO FAMILY 2008 TRUST; and SANDRA
21 HANSON-VELLOO, Trustee of the
22 VELLOO FAMILY 2008 TRUST

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25
26 UNITED STATES DISTRICT COURT
27
28 NORTHERN DISTRICT OF CALIFORNIA

29 CRAIG YATES, an individual,
30 Plaintiff,

31 v.

32 STORE 24 EXPRESS, INC.; PALANI VELLOO,
33 Trustee of the VELLOO FAMILY 2008 TRUST;
34 SANDRA HANSON-VELLOO, Trustee of the
35 VELLOO FAMILY 2008 TRUST,

36 Defendants.

37 Case No. CV-11-1945-EDL

38 STIPULATION FOR FURTHER EXTENSION
39 OF TIME FOR DEFENDANTS TO RESPOND
40 TO COMPLAINT; ~~PROPOSED~~ ORDER

41 Pursuant to Local Rule 6.1(a), Plaintiff CRAIG YATES, and Defendants STORE 24
42 EXPRESS, INC.; PALANI VELLOO, Trustee of the VELLOO FAMILY 2008 TRUST; SANDRA
43 HANSON-VELLOO, Trustee of the VELLOO FAMILY 2008 TRUST, by and through their

1 respective counsel, respectfully request and make the following stipulation:

2 1. Whereas, defendants STORE 24 EXPRESS, INC.; PALANI VELLOO, Trustee of
3 the VELLOO FAMILY 2008 TRUST; SANDRA HANSON-VELLOO, Trustee of the VELLOO
4 FAMILY 2008 TRUST have been served with the summons and complaint; and

5 2. Whereas, defendants STORE 24 EXPRESS, INC.; PALANI VELLOO, Trustee of
6 the VELLOO FAMILY 2008 TRUST; SANDRA HANSON-VELLOO, Trustee of the VELLOO
7 FAMILY 2008 TRUST's responsive pleading was originally due on June 13, 2011 and
8 Defendants received an extension of time to file a responsive pleading to July 11, 2011; and

9 3. Whereas, defendants STORE 24 EXPRESS, INC.; PALANI VELLOO, Trustee of
10 the VELLOO FAMILY 2008 TRUST; SANDRA HANSON-VELLOO, Trustee of the VELLOO
11 FAMILY 2008 TRUST are requesting an additional thirty (30) day extension of time to file a
12 responsive pleading to August 11, 2011; and

13 4. Whereas, pursuant to the General Order 56, ¶3 and 4, the parties were
14 required to hold the Joint Site Inspection by August 1, 2011; and

15 5. Whereas, the Joint Site Inspection took place on June 13, 2011;

16 6. Whereas, defendant STORE 24 EXPRESS, INC. has received the report from
17 Plaintiff's consultant regarding the Joint Site Inspection which took place on June 13, 2011;

18 7. Whereas, the parties are actively attempting to negotiate a settlement in this
19 matter and wish to reduce fees, costs and litigation expenses in so doing; and

20 8. Whereas, the parties believe it would be in the interest of efficiency and
21 economy to extend the deadline for defendants STORE 24 EXPRESS, INC.; PALANI VELLOO,
22 Trustee of the VELLOO FAMILY 2008 TRUST; SANDRA HANSON-VELLOO, Trustee of the
23 VELLOO FAMILY 2008 TRUST to file a responsive pleading and allow time to negotiate an
24 agreement; and

25 9. Whereas, plaintiff CRAIG YATES has agreed to grant an additional thirty (30)
26 day extension of time for defendants STORE 24 EXPRESS, INC.; PALANI VELLOO, Trustee of
27 the VELLOO FAMILY 2008 TRUST; SANDRA HANSON-VELLOO, Trustee of the VELLOO
28 FAMILY 2008 TRUST to file a responsive pleading; and

1 10. Whereas, defendants' counsel further stipulates that defendants will comply with
2 any and all due dates dictated by the Federal Rules of Civil procedure, the Local Rules of
3 Court, and/or any scheduling order issued by this court prior to the date on which defendants'
4 responsive pleading is due.

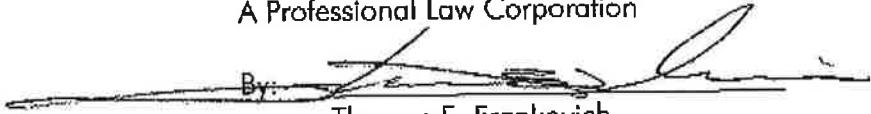
5 IT IS HEREBY STIPULATED:

6 That the last day for defendants STORE 24 EXPRESS, INC.; PALANI VELLOO, Trustee of
7 the VELLOO FAMILY 2008 TRUST; SANDRA HANSON-VELLOO, Trustee of the VELLOO
8 FAMILY 2008 TRUST's time to file a responsive pleading to Plaintiff's Complaint be extended
9 up to and including August 11, 2011.

10 IT IS SO STIPULATED.

11 Dated: July 13, 2011

12 THOMAS E. FRANKOVICH
13 A Professional Law Corporation

14 By: 
15 Thomas E. Frankovich
16 Attorneys for Plaintiff CRAIG YATES

17 Dated: July 13 2011

18 WEINTRAUB GENSHLEA CHEDIAK
19 a law corporation

20 By: 
21 Charles L. Post

22 Attorneys for Defendants STORE 24 EXPRESS,
23 INC.; PALANI VELLOO, Trustee of the VELLOO
24 FAMILY 2008 TRUST; SANDRA HANSON-
25 VELLOO, Trustee of the VELLOO FAMILY 2008
26 TRUST

1 ORDER

2 IT IS HEREBY ORDERED that the time for defendants STORE 24 EXPRESS, INC.; PALANI
3 VELLOO, Trustee of the VELLOO FAMILY 2008 TRUST; SANDRA HANSON-VELLOO, Trustee
4 of the VELLOO FAMILY 2008 TRUST to file a responsive pleading to Plaintiff's Complaint is
5 extended up to and including August 11, 2011.

6 IT IS SO ORDERED.

7 Dated: July 15, 2011

